

TOYOTA

TO: INDIANA DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

DATE: 2012

RE: Information Packet for Corrosion-Resistant Compound (CRC) Campaign C0D

SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

INDIANA DEALER INFORMATION PACKET

Toyota is launching a Corrosion-Resistant Compound (CRC) Campaign for 2001-2004 model year (MY) Sequoia vehicles registered in certain cold climate states with high road salt use ("Cold Climate States"). For ease of reference, this Campaign will be referred to by its assigned internal designation -- "C0D".

For the Sequoia C0D, your dealership will use the same two Vaupel HSDR 3300 spray guns already issued to you for the Tundra B0D to apply the same CRC materials now being used for the B0D – *i.e.*, 712 AM and Noxudol 300 S. You will apply these CRCs in the same limited spraying space already being used for the B0D.

Applying the CRC materials and using the Vaupel HSDR 3300 spray gun raises compliance obligations under federal, state and/or local laws related to ***air emissions, fire code approval and recordkeeping***. The Tundra B0D Dealer Information Packet ("B0D Packet") contained a detailed explanation of these compliance obligations. This Sequoia C0D Dealer Information Packet does not repeat that extensive discussion, but instead assumes your familiarity with these obligations and identifies the steps that Toyota Motor Sales, U.S.A., Inc. (TMS) recommends you undertake to assure your dealership's continued compliance with these obligations while conducting the Sequoia C0D.

Please review this Dealer Information Packet carefully. If, after reviewing this Packet, you have any questions or concerns, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.

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Step One

Before You Begin The Sequoia C0D, Re-Review the Tundra B0D Dealer Information Packet.

1. Due to the substantial similarities between the Sequoia C0D and the Tundra B0D, this Dealer Information Packet does not repeat the extensive discussion of legal requirements set forth in the B0D Packet.
2. Instead, it is expected that you will carefully and fully re-review the B0D Packet prior to starting the Sequoia C0D, so that you understand all steps your dealership must take to comply with the applicable legal requirements while conducting the Sequoia C0D.
3. You received a copy of the B0D Packet previously, but in the event you need an additional copy, that Packet is available for download on the C.L.E.A.N. Dealer Website (<http://cleandealer.com>).

Step Two

Before You Begin The Sequoia C0D, Confirm That Your Dealership Satisfies All Of The Criteria Set Forth Below.

1. **Your dealership will conduct the Sequoia C0D in the same spraying space currently being used for the Tundra B0D and in accordance with the Technical Instructions for the Sequoia C0D.**
 - a. The spraying space currently being used for the Tundra B0D has already been approved by the State Fire Marshal's office and/or your local fire code enforcement official.
 - b. To operate consistent with this approval, you must conduct the Sequoia C0D in this same spraying space currently being used for Tundra B0D and do so in accordance with the Technical Instructions for the Sequoia C0D.
 - c. If your dealership is not participating in the Tundra B0D or will not conduct the Sequoia C0D in the same spraying space currently being used for Tundra B0D, you may need a new approval from the State Fire Marshal's office and, potentially, your local fire code enforcement official. Please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.
2. **Your dealership will remain exempt from air permitting by continuing to comply with all applicable air regulatory requirements as set forth in the Tundra B0D Packet.** These requirements are summarized below. You should refer to the B0D Packet for details.
 - a. Your dealership does not currently have an air permit issued by the Indiana Department of Environmental Management (IDEM).
 - b. Your dealership keeps its total actual emissions of Volatile Organic Compounds ("VOCs") and Particulate Matter ("PM") below the levels that

would trigger air permitting under the "permit by rule" exemption – *i.e.*, 20 tons per year of VOCs and 20 tons per year of PM.

- i. Your dealership's actual emissions should be well below these thresholds as long as you do **not** operate a very large on-site or offsite body shop or otherwise engage in substantial painting, spraying or other activities that use spray guns.
 - ii. TMS has obtained a formal determination from IDEM confirming this point. (See Appendix A on air recordkeeping for a copy of this determination.)
- c. Your dealership will continue to restrict vehicle processing in order to comply with hourly PM emissions limits as follows:
- (1) **Process no more than one Tundra every 2 hours.**
 - OR**
 - (2) **Process no more than one Sequoia every 2 hours.**

Please refer to the Tundra B0D Packet for further guidance on how to follow these vehicle processing restrictions.

- d. **If your dealership is located in Evansville, Indiana, you will continue to comply with the requirements set forth in the Certificate of Operation issued to your dealership by the Evansville EPA.**
 - i. TMS worked with your dealership to obtain an air permit from the Evansville EPA for the Tundra B0D. You may conduct the Sequoia C0D under this Certificate of Operation.
 - ii. Appendix B of this Packet summarizes your obligations and contains new forms that you should use for recordkeeping.
- 3. Your dealership will continue to comply with all applicable fire, building and zoning code requirements as set forth in the B0D Packet.** These requirements are summarized below. You should refer to the B0D Packet for details.
- a. As noted above, your dealership should conduct the Sequoia C0D in the limited spraying space that already has been approved by the Indiana State Fire Marshal's Office and/or your local fire code enforcement official and is now being used to conduct the Tundra B0D.
 - b. If, when inspecting and/or approving your limited spraying space, the State Fire Marshal's Office and/or your local fire code enforcement official issued you a local permit or other approval that established special requirements or restrictions, then you must:

- i. Confirm that the local permit or approval is not time-, vehicle- or CRC material-limited in such a way that it will not apply to the Sequoia COD¹; and
 - ii. Continue to comply with the special requirements or restrictions in the local permit or approval.
- c. Your dealership also must continue to comply with any additional environmental, health, safety and zoning requirements identified for your local jurisdiction in "Table 1" of the BOD Packet.
- d. The State Fire Marshal's office should have already notified your local fire code enforcement official that you have been approved to conduct CRC campaigns (including the Sequoia COD) at your dealership. You will not be required to provide any additional notice to your local fire code official to conduct the Sequoia COD at this time.
- e. During application of the CRCs in the limited spraying space approved by the State Fire Marshal's Office (and/or your local fire code enforcement official), your dealership must continue to satisfy the requirements set forth in the BOD Packet "Site Selection Section," which are summarized below:
- i. Maintain positive mechanical ventilation in the spray space and surrounding area that provides a minimum of six air changes per hour. (**Reminder:** if this requirement is met by a fan that is located within 20 feet of the BOD work area, the fan must be explosion-proof).
 - ii. Have no open flames, spark-producing equipment, or drying, curing, or fusion apparatuses within 20 feet of the limited spraying space.
 - iii. Have fire extinguishers rated "B", "AB", or "ABC" within 30 feet of the limited spraying space.
 - iv. Follow best management practices for handling and storage of the CRC materials.

If you cannot satisfy all of the foregoing criteria in Step Two above, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.

¹ If you are facing this situation, or you have any questions on this point, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) for assistance.

Step Three Before You Begin The Sequoia C0D, Complete The Readiness Checklist Process

1. For Tacoma LSC 90D and Tundra B0D, you completed a detailed Readiness Survey to confirm that your dealership was ready to begin each of these CRC campaigns. As long as your dealership will conduct the Sequoia C0D in the spray space that already has been approved by the local fire code enforcement official (and is now being used to conduct the Tundra B0D) and will otherwise satisfy the requirements in Steps One and Two above, then you may use a more simple Readiness Checklist process. To complete the Readiness Checklist process and confirm that your dealership is ready to begin conducting the Sequoia C0D, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>).
2. Only after completing the Readiness Checklist process will your dealership be able to order kits with the CRC materials for the Sequoia C0D.

Step Four You Can Now Begin Conducting The Sequoia C0D, But Do So In Compliance With The Requirements Set Forth Below.

1. **Adhere to the vehicle processing limits discussed in Step Two above by not processing more than one Tundra every 2 hours or one Sequoia every 2 hours.** Please use the "Sequoia and Tundra Daily Production Log" in Appendix A of this Packet to document that you are following these vehicle processing restrictions.
2. **Comply with air recordkeeping obligations that apply to both the Tundra B0D and the Sequoia C0D by using the new forms provided in Appendix A of this Packet. (You should no longer need to use the forms provided with the Tundra B0D Packet, but you must keep the previously completed forms on file for the time period specified in the B0D Packet.)**
 - a. The B0D Packet details the air recordkeeping obligations that apply to CRC campaigns. Your dealership must comply with these same obligations when conducting the Sequoia C0D.²
 - b. Appendix A to this Packet provides forms that you can use to meet these obligations as follows:
 - i. Track the number of vehicles processed under the Tundra B0D and the Sequoia C0D and resulting air emissions using the "Tundra and Sequoia Daily Production Log".

² Please note that while your dealership must comply with hazardous waste requirements generally, the materials associated with the Tundra B0D and the Sequoia C0D do not constitute "hazardous waste" when discarded. As such, neither the Tundra B0D nor the Sequoia C0D will generate hazardous waste or impact your dealership's hazardous waste generator status.

- ii. Demonstrate that employees who conduct the CRC campaign have received proper training using the Indiana Toyota CRC Campaigns Personnel Training Log.
 - d. Your dealership must also keep copies on file of other documents describing the CRC materials and the spray gun that were provided in the BOD Packet.
- 4. **If your dealership is located in Evansville, Indiana, comply with the requirements of the Certificate of Operation issued to you by the Evansville EPA.** Please see Appendix B of this Packet for more information.

The steps outlined above, in conjunction with the more detailed explanation provided in the Tundra BOD Packet, should help to assure that your dealership conducts both the BOD and the Sequoia COD in compliance with the relevant federal, state, and local requirements. This Sequoia COD Dealer Information Packet is not intended to cover other air, waste management, hazardous material, water, or other environmental laws and regulations that might apply to operations at your dealership other than the application of CRC materials as part of the Tundra BOD or Sequoia COD. We assume that you already comply with other environmental, health, and safety requirements that apply to your facility.

If you have any questions after reviewing this Dealer Information Packet and the BOD Packet, or the Technical Instructions, please go to the C.L.E.A.N. Dealer website (<http://cleanddealer.com>) or call the EH&S Hotline (877-572-4347).

Thank you for your cooperation.

TOYOTA MOTOR SALES, U.S.A., INC.

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SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D
INDIANA DEALER INFORMATION PACKET

APPENDIX A –AIR RECORDKEEPING

Your dealership must maintain the records included in this Appendix to comply with state air regulatory recordkeeping and retention requirements. *This Appendix contains the following new documents:*

1. "Indiana Sequoia and Tundra Daily Production Log": A new "Indiana Sequoia and Tundra Daily Production Log" that you can use for both the Tundra B0D and the Sequoia C0D to track the number of vehicles processed by your dealership each day and the resulting air emissions. (You no longer need to use the version of this form included in the B0D Packet, **but you must keep the previously completed forms on file for the time period specified in the B0D Packet.**)
2. "Indiana Toyota CRC Campaigns Personnel Training Log": A new "Indiana Toyota CRC Campaigns Personnel Training Log" that you can use to demonstrate that employees conducting Toyota CRC Campaigns have been properly trained, and that they have reviewed all of the relevant CRC Campaign materials for Indiana, including the Getting Started Guide, the Federal, State and Local Requirements Guide, and the Technical Instructions, and understand the proper use, handling and operation of the CRC materials.
3. Letter dated June 12, 2012 from the Indiana Department of Environmental Management (IDEM): TMS has presented information to IDEM regarding the Sequoia C0D and its air emissions and has received a formal determination from IDEM that the Sequoia C0D does not require an air permit.

In addition to the above documents, the Tundra B0D Packet contained several documents that your dealership should continue to keep on file for both the Tundra B0D and Sequoia C0D. If you cannot locate these documents, then you can download the B0D Packet that contains these documents from the C.L.E.A.N. Dealer website (<http://cleandealer.com>).

Important: Please maintain these documents in your dealership's records for a period of five (5) years after the last day that you spray a Tundra or Sequoia at your dealership.

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Instructions for Completing the Indiana Sequoia and Tundra Daily Production Log

Follow these 4 steps to complete the Indiana Sequoia and Tundra Daily Production Log.

Maintain the completed logs in your dealership's records for a period of five years after the last day that that you apply CRCs to a Sequoia or Tundra vehicle at your dealership.

Step 1:
Enter the "Reporting Year" and your "Dealership Name" at the top of the log.

Step 2:
Enter the date and the number of Sequoias and Tundra vehicles that you processed on that date.

Step 3:
Enter the time that you finished processing each vehicle. To comply with air emissions limits, you should not process more than one vehicle (Sequoia or Tundra) every two hours.

Step 4:
Locate the row that corresponds to the number of Sequoias (down the left side) and the column that corresponds to the number of Tundras (across the top) processed each day. Enter the values in the box where the row and column intersect in the production log to record the amount of VOC and PM emissions produced on that day.

Reporting Year: _____ Dealership Name: _____

Date	SEQUOIA		TUNDRA		Emissions <i>Use the Emissions Estimator to determine the daily total</i>	
	Number of Sequoias	Time of Completion	Number of Tundras	Time of Completion	VOC (lbs)	PM (lbs)
3-1-12	0	--	2	2:30, 5:00	0.22	0.20
3-2-12	1	10:30	2	1:00, 3:15	0.38	0.31
3-3-12	3	12:00, 2:15, 5:30	0	--	0.48	0.33
3-4-12	2	3:00, 5:15	2	10:45, 1:00	0.54	0.42
3-5-12	2	11:15, 5:00	1	2:15	0.43	0.32
3-6-12	0	--	4	10:35, 12:50, 3:15, 5:45	0.44	0.40

EMISSIONS ESTIMATOR

		TUNDRAS					
		0	1	2	3	4	5
SEQUIOIAS	0	VOC = 0 PM = 0	VOC = 0.11 PM = 0.10	VOC = 0.22 PM = 0.20	VOC = 0.33 PM = 0.30	VOC = 0.44 PM = 0.40	VOC = 0.55 PM = 0.50
	1	VOC = 0.16 PM = 0.11	VOC = 0.27 PM = 0.21	VOC = 0.38 PM = 0.31	VOC = 0.49 PM = 0.41	VOC = 0.60 PM = 0.51	VOC = 0.71 PM = 0.61
	2	VOC = 0.32 PM = 0.22	VOC = 0.43 PM = 0.32	VOC = 0.54 PM = 0.42	VOC = 0.65 PM = 0.52	VOC = 0.76 PM = 0.62	VOC = 0.87 PM = 0.72
	3	VOC = 0.48 PM = 0.33	VOC = 0.59 PM = 0.43	VOC = 0.70 PM = 0.53	VOC = 0.81 PM = 0.63	VOC = 0.92 PM = 0.73	VOC = 1.03 PM = 0.83
	4	VOC = 0.64 PM = 0.44	VOC = 0.75 PM = 0.54	VOC = 0.86 PM = 0.64	VOC = 0.97 PM = 0.74	VOC = 1.08 PM = 0.84	VOC = 1.19 PM = 0.94
	5	VOC = 0.80 PM = 0.55	VOC = 0.91 PM = 0.65	VOC = 1.02 PM = 0.75	VOC = 1.13 PM = 0.85	VOC = 1.24 PM = 0.95	VOC = 1.35 PM = 1.05

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Indiana Sequoia and Tundra Daily Production Log

Date	SEQUOIA		TUNDRA		Emissions <i>Use the Emissions Estimator to determine the daily total</i>	
	Number of Sequoias	Time of Completion	Number of Tundras	Time of Completion	VOC (lbs)	PM (lbs)

Emissions Estimator

Locate the row that corresponds to the number of Sequoias (down the left side) and the column that corresponds to the number of Tundras (across the top) processed each day. Enter the values in the box where the row and column intersect in the production log to record the amount of VOC and PM emissions produced.

		TUNDRAS					
		0	1	2	3	4	5
SEQUOIAS	0	VOC = 0 PM = 0	VOC = 0.11 PM = 0.10	VOC = 0.22 PM = 0.20	VOC = 0.33 PM = 0.30	VOC = 0.44 PM = 0.40	VOC = 0.55 PM = 0.50
	1	VOC = 0.16 PM = 0.11	VOC = 0.27 PM = 0.21	VOC = 0.38 PM = 0.31	VOC = 0.49 PM = 0.41	VOC = 0.60 PM = 0.51	VOC = 0.71 PM = 0.61
	2	VOC = 0.32 PM = 0.20	VOC = 0.43 PM = 0.32	VOC = 0.54 PM = 0.42	VOC = 0.65 PM = 0.52	VOC = 0.76 PM = 0.62	VOC = 0.87 PM = 0.72
	3	VOC = 0.48 PM = 0.33	VOC = 0.59 PM = 0.43	VOC = 0.70 PM = 0.53	VOC = 0.81 PM = 0.63	VOC = 0.92 PM = 0.73	VOC = 1.03 PM = 0.83
	4	VOC = 0.64 PM = 0.44	VOC = 0.75 PM = 0.54	VOC = 0.86 PM = 0.64	VOC = 0.97 PM = 0.74	VOC = 1.08 PM = 0.84	VOC = 1.19 PM = 0.94
	5	VOC = 0.80 PM = 0.55	VOC = 0.91 PM = 0.65	VOC = 1.02 PM = 0.75	VOC = 1.13 PM = 0.85	VOC = 1.24 PM = 0.95	VOC = 1.35 PM = 1.05

Duplicate as Necessary

Indiana Toyota CRC Campaigns Personnel Training Log

[Duplicate as Necessary]

Reporting Year: _____ Dealership Name and Location: _____

Instructions: Dealerships should use this log to confirm that the employees conducting Toyota CRC Campaigns have been properly trained. Maintain this log, along with a complete copy of all Indiana Dealer Information Packets, in accordance with your dealership's recordkeeping practices, or for five (5) years after spraying the last Toyota vehicle under the CRC campaign.

The undersigned have reviewed all of the Relevant CRC Campaign materials for Indiana and understand the proper use, handling and operation of the CRC materials and equipment.

Employee Names

Date Trained

Signature of Service/General Manager:

Date:

Address & Contact of Service/General Manager:

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

June 12, 2012

Daniel E. Monette
Toyota Motor Sales, U.S.A., Inc.
19001 South Western Avenue
Torrance, CA 90501

Re: Exempt Construction and Operation Status
Toyota Corrosion Resistant Compound
(CRC) program

Dear Mr. Monette:

Representatives of Toyota Motor Sales, U.S.A. Inc. ("TMS") met with us recently to discuss the Sequoia Corrosion Resistant Compound ("CRC") program for model year 2001-2004 vehicles. In addition, TMS has asked that IDEM consider whether future CRC campaigns, not yet specifically identified, that would be conducted using the same equipment and coatings would also be exempt from permitting requirements. Based upon the information and data provided to IDEM Office of Air Quality ("OAQ") and the provisions in 326 IAC 2-1.1-3, it has been determined that the activities surrounding the Sequoia CRC program, as well as any other CRC program that meets the parameters outlined in the letter dated May 15, 2012, submitted to IDEM on behalf of TMS, would be considered exempt from air pollution permit requirements. This exemption applies to all CRC activities in the State of Indiana.

The following conditions shall be applicable:

1. 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies) – Based on information provided as part of this exemption request, IDEM has determined that given the higher transfer efficiency of the Vaupel HSDR 3300 spray gun, in combination with the high solids and high viscosity of the anti-corrosion sealants (Noxudol 300 S and 712AM) being applied inside a partition area will satisfy the requirements of this rule. Toyota dealers implementing the CRC program should maintain and operate the spray guns according to the manufacturer's recommendations and within the parameters established by the manufacturer for setup and operations. If accumulation of overspray is observed on the ground outside the work area, then the dealer should install additional overspray controls or implement additional IDEM-approved control measures.
2. 326 IAC 8-10 (Automobile Refinishing) – Rule 326 IAC 8-10 applies to Automobile Refinishing in all counties in Indiana with some exemptions. Section (5)(b)(3) of the rule states, "Any other coating application equipment that has been demonstrated, by the owner or operator, to the satisfaction of the department to be capable of achieving at least sixty-five percent (65%) transfer efficiency. The owner or operator must submit sufficient data for the department to be able to determine the accuracy of the transfer efficiency claims". Based on a review of the

information submitted as part of this exemption request, and the relevant portions of the South Coast Air Quality Management District determination related to the Vaupel HSDR 3300 spray gun, these guns are approved under 326 IAC 8-10-5(b)(3) for affected sources in Indiana. Toyota dealers implementing the CRC program shall operate these guns in accordance with manufacturer's specifications and within the parameters established by the manufacturer for setup and operations.

An application or notification shall be submitted in accordance with 326 IAC 2 to OAQ if a Toyota dealer implementing a CRC program proposes to construct additional emission units, modify existing emission units, or otherwise alter the conditions or parameters of the project in a way that requires application or notification under the applicable rules. If you have any questions on this matter, please contact Matthew Stuckey, OAQ Permits Branch Chief, 100 North Senate Avenue, MC-61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, at 317-233-0203 or at 800-451-6027 (ext. 3-0203).

Sincerely,



Keith Baugues, Assistant Commissioner
Office of Air Quality

cc: Compliance and Enforcement Branch

Barnes & Thornburg, LLC
c/o Anthony C. Sullivan
11 S. Meridian Street
Indianapolis, IN 46204-3535

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SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

INDIANA DEALER INFORMATION PACKET

APPENDIX B – EVANSVILLE AIR PERMITTING

If your dealership is not located in Evansville, Indiana, you may stop reading, as the information and requirements in this Appendix B do not apply to you.

The application of CRCs results in emissions of Volatile Organic Compounds ("VOCs") and Particulate Matter ("PM"). In Evansville, Indiana, the emission of these pollutants requires your dealership to obtain, and to operate in accordance with, a Certificate of Operation from the Evansville EPA.

At the time of the Tacoma LSC 90D, TMS worked with you to obtain a Certificate of Operation from Evansville EPA, and then, to obtain a new Certificate of Operation under which you are now conducting the Tundra B0D. Your dealership can conduct the Sequoia C0D under this same Certificate of Operation issued for the Tundra B0D. A copy of this Certificate is attached to this Dealer Packet, please keep this for your records.

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Jonathan Weinzapfel
Mayor

CITY OF EVANSVILLE
Environmental Protection Agency
100 East Walnut Street
C.K. Newsome Community Center
Evansville, Indiana 47713
Ph: 812/435-6145 Fax: 812/435-6155
www.evansvillegov.org/epa

Expires: September 2016
EEPA Will Initiate Municipal Permit Renewal

Certificate of Operation #0872
Supersedes all permits issued prior to 9/15/11

Issued To:
Kenny Kent Toyota Service Center
5600 Division Street
Evansville, IN 47715

Is hereby authorized to operate (X)
Is hereby authorized to install (X)

Facility Description NAICS 81111 - General Automotive Repair

- Three (3) Vaupel HSDR 3300 spray guns to apply additional corrosion-resistant compounds to truck frame rails. Corrosion-resistant compounds to be applied are NOX-Rust 712AM, NOX-Rust X128T, and Noxudol 300 S.

Insignificant Activities:

- One (1) 3,000 gallon above ground gasoline storage tank. Maximum monthly throughput is estimated at 6,500 gallons.
- Two (2) parts cleaners (cold cleaners) using mineral spirits.

This permit is issued under the provisions of the Evansville Municipal Code (EMC) 16.05 with the following conditions:

1. That the data and information supplied in the application shall be considered part of this permit.
2. That the permittee shall comply with the provisions of the Evansville Municipal Code (EMC 16.05.010 through 16.05.510) and the rules promulgated there under.
3. That all permitted equipment shall be operated and maintained in accordance with the manufacturers' specifications.

City of Evansville Requirements

Pursuant to EMC 16.05.500, compliance with Particulate Matter (PM) and Volatile Organic Compound (VOC) Emission Limitations will be assumed if requirements A-B are met:

A. Particulate Control Requirements and Procedures [Pursuant to EMC 16.05.180 (H)]:

Particulate emissions from the surface coating application process shall be controlled. Permittee shall install curtains enclosing the area in which the coating application process will occur prior to commencement of the surface coating application process. Curtains shall be in place at all times surface coating operations are taking place. Curtains shall consist of material such as plastic or canvas and shall be sufficient to control overspray.

- (1) Conduct quarterly building exterior perimeter checks for areas which could be affected by overspray. If no surface coating activities have taken place during that calendar quarter, no visual inspection is required; however a notation shall be made on the records to that effect. A record of inspections must be kept for three (3) years and made available for review by any EEPA personnel.

(over)

- (2) Provide initial VOC emission reduction training to employees whose job responsibilities include any refinishing method within 180 days of their employment date. Records of such training for each employee must be maintained for three (3) years and made available for review by any EEPA personnel.
- (3) Provide annual refresher VOC emission reduction training by May 1st to employees whose job responsibilities include any refinishing method. Records of such training for each employee must be maintained for three (3) years and made available for review by any EEPA personnel.

B. For Volatile Organic Compound (VOC) control [Pursuant to EMC 16.05.500 and EMC 16.05.240]:

- (1) Unless in use, all VOC containing materials shall be stored in closed containers.
- (2) The containers shall remain closed unless in use, being filled or emptied.
- (3) All fresh or used solvent and waste coatings shall be stored in closed containers.
- (4) Storage containers and equipment shall be free from cracks and holes.
- (5) All VOC contaminated waste materials must be disposed of in such a manner as to minimize emissions.
- (6) The owner or operator of a cold cleaning facility constructed after January 1, 1980 shall:
 - (a) equip the cleaner with a cover;
 - (b) equip the cleaner with a facility for draining cleaned parts;
 - (c) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) provide a permanent, conspicuous label summarizing the operating requirements;
 - (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

C. General Requirements:

- (1) All pollution control equipment controlling emissions to the environment must be operated according to manufacturers' specifications at all times the associated process equipment is in operation.
- (2) Pursuant to EMC 16.05.270 (I) (5), a Throughput Report covering LSC and BOD usage during the previous calendar year must be submitted to the Evansville EPA by the date specified on the request.
- (3) Pursuant to EMC 16.05.320, an annual Operating fee shall be remitted to the Evansville EPA by the date specified on the invoice. The first annual Operating fee invoices will be issued in the first calendar quarter of 2011.
- (4) Source shall comply with 326 IAC 8-10 [Automobile Refinishing] incorporated by reference in EMC 16.05.240 (see Attachment A).

Date: 9/15/11

Approved By: _____

D. Ohning
D. Ohning, Director